

Compliance Review

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Thu 8/28/2014 5:05 PM

Required: Leonard Carr <leonard.carr@omnipluspharmacy.com>; Dan Milosevic <dan.milosevic@omniplushealthcare.com>;
Branko Milosevic <branko.milosevic@omniplushealthcare.com>; Scott Breimeister
<Scott.Breimeister@pharmsmgmt.com>; Raghu Chintalapally <raghu.chintalapally@omniplushealthcare.com>;

Gents,

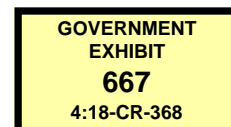
I would like to have a compliance review meeting tomorrow to review all of our sales rep relationships. I expect this will take 90 minutes. Please let me know if you have a conflict and need to propose an alternate time.

Thanks,
Leo

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Mtg - Msmt & BS & VR 8/29/14

REDACTED

1. 2. NV matter - Investigation
 - 2 days ago call from -
NV Board called Amy McNeely
re dispense of Bulk Ings to Phys (particularⁱⁿ
Dr Beckett) Ask for Rx from Beckett to
 - BM said we don't dispense in bulk } OPHC
 - Danny Garcia (DG) Investigator, NV state Board of Pharmacy. Issue is payments to Physicians for writing Rx.
Primarily investigating
 - DG stated allegation 3 wks ago - called the Board that Omnicplus was paying Drs for writing Rx's.
 - BM stated absolutely not writing paying Drs for Rx's. That we pay follow the letter of the law. EM from one Dr to Another, "we have found an additional source of income." There is a pharmacy in Houston, start sending Rx to this Pharmacy
 - BM stated he inquired about marketing practices, BM told him about Pharms, Independent Sales Reps,
DG "why are NV Drs sending Rx to Houston"

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7. DG said there were Rx for NV Medicare.

Preliminary investigation

- BM said we will comply in good faith.
- DG said pre-printed script pads are not allowed in NV
- BM sent EM to DG 8/28 asking for specific law.
- DG asked BM not to tell Beckett ^{about} _{investigation}

REDACTED

REDACTED

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Compliance Review Meeting 8/29/14

1. New policy ~~from~~ Compliance review
First day of ~~every~~ September
made

★

(1) Policy to conduct Internal compliance
review on Quarterly Basis, Beg. Sept 1,
2014

(2)

Reps w/o signed agreements =

- a. James Blackburn / Blackburn Interests (no contr)
- b. Nilsson Medical / John Knudsen (No contr)
- c. Jose Manuri / NOLA - Surg
- d. Mario Ruja /
- e. Zach Palmer

SAB to send EM that agreements must be returned
by

(3)

Beckett conversation w/ Scott

- 1. will not write Rx
- 2. No problem w/ credit for Beckett Rx
- 3. No relationship w/ other docs

~~XXXX~~

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REDACTED

⑤ Scott:

1. Call Jordan Chase re W-2 vs 1099?
2. write EMs to 5 reps w/o signed agreements that they w/b terminated 8/2 if agmts not rtd by 8/31

⑥ Leo call set up mtg w/ Marimon Baker

⑥

Branko/LC:

Draft and send Qtrly compliance confirmation email

o Cocle Questionnaire for Reps / SubReps

⑤

ERIK

★ ① Run check on all Reps & Sales SubReps against patent list to determine if Rx ^{on self} has been written / paid commission

② How do we exclude ~~manual payments~~ commissions ~~on~~ on Reps

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Review of Reps - Qtrly Compliance Review
for all reps

① Merrimon Baker =

★

(a) ~~Set~~ LC to set up meeting w/ Baker to
discuss Reason to believe:

1. Does he work for Fleming?

2. ~~Have you ever~~
w.

3. Have you worked remotely?

4. What is your relationship w/ him

5. What is status of license?

② Brian Bass = OK

③ Maddy Beckett =

(a) No scripts from Beckett can be filled

(b) Reverse Commissions paid on Beckett Rx

★ → (c) LC/Branko = Draft letter to MARD

① remove Beckett

② Credit commissions paid in error
or 8/15

③ Notify no future Rx from Beckett
After consulting w/ counsel

④ Blacksburn =

✓ (a) No agreement signed / Scott to send EM

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⑤ Tommy Bond:

⑥ SAB Call Kathy re can he be a rep

⑥ BR House:

* ⑦ Internal Code of Compliance for
Brian & Team

* ⑧ Is he paid

~~⑦ David Brown - Sub~~

⑦ Jon Castorena = OK

⑧ Dowdell, Cisco: OK

NV ⑨ Evangeline Duke = OK

⑩ Sub-rep Charleston LLC (Dr Daniel Benaford OPS)

⑩ Elkins, Mike = OK

? [ADD] ⑪ Ellis, Lance = Sub-rep KOC MKT
Personal Rx

⑫ Fioroni, Paul = Sub-rep

⑬ Goetz, Natalie:

[ADD]? ⑭ Sub-rep Collette James is sub-rep
& married to doctor writing Rx.

SAB CONFIDENTIAL * Husband cannot send Rx or James
must be terminated as sub-rep CARR_000018